UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

NASIR KHAN,		§ §	
	Plaintiff,	§ §	
v.		§	CIVIL ACTION NO. 4:21-cv-00033
ISOTHERM, INC.,		§ § 8	
	Defendant.	\$ \$	

DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Isotherm, Inc. ("Isotherm" or "Defendant") files this Notice of Removal of the civil action originally filed in the 236th Judicial District Court of Tarrant County, Texas entitled *Nasir Khan v. Isotherm, Inc.*, Cause No. 236-322067-20 (the "State Court Action"). In support of this Notice of Removal, Isotherm states as follows:

- On December 9, 2020, Plaintiff filed his Original Petition in the State Court Action.
 Ex. C. Isotherm was served with citation and Plaintiff's Original Petition on December 16, 2020.
 Ex. E.
- 2. Removal of the State Court Action pursuant to 28 U.S.C. §§ 1331, 1441, and 1446 is proper because Plaintiff's suit involves federal questions. Specifically, Plaintiff asserts causes of action under the Title VII of the Civil Rights Act of 1964 and The Equal Pay Act. Ex. C.
- 3. Removal of the State Court Action is timely as this Notice of Removal is filed within 30 days of the date upon which the citation for the State Court Action was served on Isotherm. *See* 28 U.S.C. § 1446; Ex. E.

4. Venue is proper in this District under 28 U.S.C. § 1441(a) because the 236th Judicial District Court in Tarrant County is located within the Fort Worth Division of the Northern

District of Texas.

5. Copies of all filings in the State Court Action are attached as required by 28 U.S.C.

§ 1446(a). All documents and filings required by N.D. Tex. Civ. R. 81.1. are also attached. Exs.

A-G.

6. Isotherm will promptly notify the 236th Judicial District Court of Tarrant County,

Texas of the removal of this action to federal court.

Based on the foregoing, Defendant removes this action to the United States District Court

for the Northern District of Texas, Fort Worth Division, and requests any and all such further relief

and remedies to which it may be entitled.

Respectfully submitted,

/s/ Blake A. Bailey

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

On this 11th day of January 2021, I electronically submitted the foregoing document with the clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I therefore certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Blake A. Bailey
Blake A. Bailey